

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

*In re:*

FINANCIAL OVERSIGHT AND  
ADMINISTRATION BOARD FOR  
PUERTO RICO,

As a representative of the

COMMONWEALTH OF PUERTO RICO *et al.*,

Debtors.

PROMESA

Title III

Number 17BK 3283-LTS

(Jointly administered)

**RESPONSE TO THE FIVE HUNDRED SEVENTY-SEVENTH OMNIBUS OBJECTION  
(SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO, THE  
EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE  
COMMONWEALTH OF PUERTO RICO, AND THE PUERTO RICO HIGHWAYS  
AND TRANSPORTATION AUTHORITY TO CLAIMS FOR WHICH THE DEBTORS  
ARE NOT LIABLE**

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To the Honorable United States Court Judge Laura Taylor Swain:

The group of plaintiffs under the case Maggie Acevedo Sepúlveda et al. V. Department of Health of Puerto Rico, before the Public Service Appellate Commission (CASAP), under number 2000-06-1639, Case before the Supreme Court of Puerto Rico CC-2012-1050, file this reply to the forty-seventieth global objection and respectfully state the following:

1. Mrs. Daisy Charon Santiago, claim # 27404, member of the group of Plaintiff under the case Maggie Acevedo Sepúlveda et al. V. Department of Health of Puerto Rico, before the Public Service Appellate Commission (CASAP), under number 2000-06-1639, Case before the Supreme Court of Puerto Rico CC-2012-1050, contacted us about the OMNIBUS OBJECTION we're responding on this Motion, in which this Honorable Court asks her to response before May 22, 2023 if they have a claim in the case at hand.

2. Upon analysis of our records, Mrs. Charon Santiago is part of our group, although she wasn't included on our exhibit when we presented **RESPONSE TO THE FOUR HUNDRED SEVENTY-SEVENTH OMNIBUS OBJECTION (SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO AND THE EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO TO ACEVEDO SEPÚLVEDA LITIGATION CLAIMS.**
3. This was a typographical error on our part and, therefore, Mrs. Daisy Charon Santiago, must be included as member of our group of plaintiffs.

WHEREFORE, the group of plaintiffs under the Maggie Acevedo Sepúlveda et al. V. Department of Health of Puerto Rico respectfully requests that this honorable court deny the FIVE HUNDRED SEVENTY-SEVENTH OMNIBUS OBJECTION (SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO, THE EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO, AND THE PUERTO RICO HIGHWAYS AND TRANSPORTATION AUTHORITY TO CLAIMS FOR WHICH THE DEBTORS ARE NOT LIABLE on all parts related to Mrs. Daisy Charon Santiago, update record so that she is included on the group of plaintiffs under the case Maggie Acevedo Sepúlveda et al. V. Department of Health of Puerto Rico, before the Public Service Appellate Commission (CASP), under number 2000-06-1639, Case before the Supreme Court of Puerto Rico CC-2012-1050 grand grant any other remedy deemed just.

**RESPECTFULLY SUBMITTED.**

**I HEREBY CERTIFY** that on this date I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all participants of the CM/ECF system including the **Trustee** and **Debtors' counsel**.

Dated: May 8, 2023  
Ponce, Puerto Rico

/s/ Santiago A. Iturregui Del Toro  
Santiago A. Iturregui Del Toro  
USDC No.225006  
P.O. Box 7341  
Ponce, Puerto Rico 00732-7341  
saiturregui@gmail.com  
(787) 298-8155